

IN THE US DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
Civil Action No. 5:20-cv-396-FL

SIAVASH MOJARRAD,)
Administrator of the Estate of SOHEIL)
ANTONIO MOJARRAD,)
Plaintiff,)
v.)
WILLIAM BRETT EDWARDS, in his)
individual capacity,)
Defendant.)

**DEFENDANT'S MOTION TO
BIFURCATE**

NOW COMES Defendant William Brett Edwards, by and through his undersigned attorneys and pursuant to Rule 42(b) of the Federal Rules of Civil Procedure, and respectfully requests that the Court bifurcate the forthcoming trial in this matter into two phases, each before the same jury, in order to decrease the risk of a prolonged and burdensome trial, conserve judicial resources, and protect against the possibility of prejudice to Defendant. In support of this Motion, Defendant refers to the arguments and authorities set forth in the supporting Memorandum of Law as well as Defendant's Motion in Limine #25. Defendant respectfully requests that the forthcoming trial be bifurcated into the following two phases:

1. The adjudication of Plaintiff's individual claims against the Defendant; and
2. The resolution of Plaintiff's claims for punitive damages.

WHEREFORE, Defendant request that the forthcoming trial in this matter claims be trifurcated as set forth above, pursuant to Rule 42(b) of the Federal Rules of Civil Procedure.

This the 30th day of January, 2023.

HARTZOG LAW GROUP

/s/ DAN M HARTZOG, JR.
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CERTIFICATE OF SERVICE

I hereby certify that on January 30, 2023, I electronically filed the foregoing ***DEFENDANT'S MOTION TO BIFURCATE*** with the Clerk of Court using the CM/ECF system, which will effect service on all registered users.

This the 30th day of January, 2023.

/s/ DAN M HARTZOG, JR.
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